

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV
POLLUTION REPORT No. 19**

**Holtra Chem Chlor-Alkali Facility
One Industrial Drive
Riegelwood, Columbus County, NC**

TO: A. Shane Hitchcock, EPA
R. Donald Rigger, EPA
C. Fitzsimmons, EPA
G. Tan, EPA
R. Davidson, EPA
J. Bateson, NCDENR
J. Stanley, NCDENR
B. Nelms, NCDENR
S. Carbonaro, EPA
S. Urquhart-Foster, EPA

FROM: Carol A. Geraghty, OSC
USEPA Region 4/WMD/ERRB
61 Forsyth St., S.W.
Atlanta, GA 30303

DATE: May 22, 2003

I. BACKGROUND

Site No.:	A47J
Delivery Order No.:	N/A
Response Authority:	CERCLA
Incident Category:	State Referral
CERCLIS:	NCD097361018
NPL:	N
Site Category:	Industrial Chlor-alkali Facility
Responsible party:	Holtra Chem LLC, Honeywell Inc.

II. HISTORY

Refer to Action Memorandum, Consent Order, and previous POLREPs for site history.

III. SITUATION

Refer to initial and routine POLREPs for site situation.

IV. SITE ACTIVITIES

May 19 - 22, 2003

OSC Carol Geraghty provided on-site oversight of removal activities from May 20 - 22, 2003. START provided Responsible Party (RP) monitoring, site documentation, and on-site real-time air monitoring during the entire reporting week. The weather was generally overcast and temperatures ranged from the low 60s to the mid-80s.

Site activities for the week include the following. URS continued mercury cell cover removal, decontamination, and disassembly operations within the Old Mercury Cell Building. Disassembly of the covers for Cell nos. 20 and 21 were completed and operations on Cell No. 22 were initiated. The cell cover disassembly operation has again become a rate limiting step. To most effectively use worker time when there is inadequate space to stage cell covers for disassembly, workers have begun removing a portion of the bolts which attach the side-liners to the bed plates. Four bolts are being left at each joint for stability. This activity will facilitate removal of the bed plates when that step occurs. Hydrochloric acid is washed over the bed plates and drained into the denuder boxes at the end castings as part of the bed plate cleaning process. Sulphur had been placed in the cleaned bed plates the previous week to help reduce concentrations of mercury vapor. Addition of sulphur was continued this week as new bed plates were cleaned. Once disassembled and decontaminated, cell covers are being placed on pallets and moved to the Material Staging Area (MSA) or Retort Pad Decontamination Area to dry prior to screening and placing into roll-off boxes. Process piping along the west side of the Old Mercury Cell Building continued to be cut, decontaminated, and removed. Pipes, pipe racks, and other equipment continued to be removed from the Bleach Plant/Products Area. A large crane was used to remove sections of Pipe Rack F (located east and west of the Bleach Plant, Products Area, and Old Salt Dock Area), including attached cooling water pipes and electrical cable trays that had been cut the previous week. Crane operations were completed on May 22, 2003. The rack and its components are being further disassembled on the ground. Pipe Rack F is being removed to facilitate future crane operations at the Old Mercury Cell Building. Waste water pre-treatment continues in the Primary Waste Water Treatment Plant (WWTP) which is located in the Brine MESS Area. Ample holding tank storage capacity and pond freeboard exists in the event of heavy rain over the Memorial Day Weekend. URS work activities are currently estimated at 10 days behind the last approved project schedule. In total, one 25-yard hazardous-micro box, one 25-yard box of non-regulated material, two 30-yard boxes of non-hazardous construction debris, five 30-yard boxes of non-hazardous scrap metal, and one 5-yard box of non-hazardous scrap copper were transported off-site for recycling or disposal during the week. In addition to URS activities, plant personnel completed clearing debris from the scrap yard located south of the South Rainwater Pond.

The final version of the Job Safety Analysis (JSA) for "Decontamination of the Denuder and Grids", which represents the second step of the mercury cell removal process, was provided to EPA, along with a preliminary draft version of the third step, "Removal and Decontamination of the Mercury Cells." An on-site drill was conducted on May 22, 2003, to exercise emergency procedures as outlined in the HASP Emergency Response Plan. A single long blast was sounded signifying a site emergency, and radios were used to relay instructions to rally at Assembly Point

No. 1. The drill was successful and all personnel were accounted for within six minutes. This event represents the third emergency drill held at the site since demolition activities began.

Air sampling was not conducted during this work week due to forecasted rain; however, four sampling rounds are tentatively scheduled over the next two weeks. Real-time air monitoring was conducted at the established off-site air sampling stations and mercury levels were not detected above background concentrations (<10 ng/m³). On-site real-time air monitoring results from the exclusion zone perimeter locations continue to show slightly elevated readings immediately adjacent to the north and west sides of the Old Mercury Cell Building (maximum readings of 0.037 and 0.033 mg/m³ mercury, respectively); however, these levels drop off substantially upon reaching the site road system, located 10 feet beyond the monitoring points. Mercury vapor levels in the Old Mercury Cell Building ranged from 0.003 to 0.329 mg/m³. The highest reading (0.329 mg/m³) was detected in the sump pit. Exclusive of that area, the maximum reading in the remaining building locations was 0.192 mg/m³ mercury. PPE requirements continue to be Level B for cell pit operations and Level C for other building locations. Exterior operations are conducted in Level D PPE (excluding line breaking operations).

V. FUTURE ACTIVITIES

The Memorial Day Holiday will be observed on May 26, 2003. OSC Charlie Fitzsimmons will provide oversight during the May 27 - 29, 2003 work week. The cell pit may be cleaned on Friday, May 30, 2003, with a limited crew.

The next All-Hands Monthly Meeting will occur at 12:30 PM, May 28, 2003.

Site work during the next week will include mercury cell-cover removal, disassembly, and decontamination, and mercury cell-bed cleaning operations. Pipes will continue to be removed from the west side of the Old Mercury Cell Building and from the Bleach Plant/Products Area. Remaining pieces of Pipe Rack F will be disassembled. Two tanks (a former sludge tank and a water holding tank) staged in the former Cooling Tower Area will be cut into smaller sections and placed into roll-off boxes.

VI. DISPOSAL SUMMARY

Disposal Summary for Week of May 19 - 22, 2003			
Waste Stream	Disposal Destination	Quantity Shipped This Week	Quantity Shipped To Date
Hazardous - Micro	Waste Management - Emelle Treatment Facility Emelle, AL	(1) 25-yd box	(10) 25-yd boxes (2) 20-yd boxes
Non-Regulated Material (Directly Land Filled)	Waste Management - Emelle Treatment Facility Emelle, AL	(1) 25-yd box	(18) 25-yd boxes

Disposal Summary for Week of May 19 - 22, 2003			
Hazardous - Macro (Including ACM Hazardous)	Waste Management - Emelle Treatment Facility Emelle, AL	None	(18) 20-yd boxes
D009 (Wastewater Filter Cake)	EQ - Michigan Disposal Waste Treatment Belleville, MI	None	(4) boxes (est. 90,000 lbs.)
ACM (Non-Haz)	Anson Waste Management Facility Polkton, NC	Task Complete	(3) 40-yd boxes
Non-Haz Construction Debris	Sampson Co. Disposal Facility Roseboro, NC	(2) 30-yd boxes (10,880 lbs.)	(12) 30-yd boxes (75,520 lbs.)
Non-Haz Scrap Metal	Southern Metals Recycling Wilmington, NC	(5) 30-yd boxes (est. 100,000 lbs.)	(17) 30-yd boxes (est. 275,000 lbs.)
Non-Haz Scrap Titanium	Southern Metals Recycling Wilmington, NC	None	None
Non-Haz Scrap Copper	Southern Metals Recycling Wilmington, NC	(1) 5-yd box	(2) 5-yd boxes
Reclaimed Elemental Mercury (for Reuse)	Goldsmith Evanston, IL	None	(5) one-metric ton cylinders